

3:23-mj-00106

DISTRICT OF OREGON, ss:

AFFIDAVIT OF TODD HOAGLAND

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Todd Hoagland, being first duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. I am currently employed as a Special Agent with the Drug Enforcement Administration (DEA), United States Department of Justice and have been so employed since 2022. In that capacity, I investigate violations of the Controlled Substances Act, Title 21, United States Code, Section 801, et. Seq. In December 2022, I was assigned to the Salem, Oregon Resident Office. I have completed sixteen (16) weeks of DEA Basic Agent Training at the Justice Training Center in Quantico, Virginia. I am familiar with investigations of drug trafficking organizations, methods of importation and distribution of controlled substances, and financial investigations. I have assisted on multiple investigations involving organizations trafficking several controlled substances to include cocaine, heroin, methamphetamine, and fentanyl.

Purpose of Affidavit

2. This affidavit is submitted to support a criminal complaint and arrest warrant for Francisco Javier Paredes-Villasenor, Hispanic male, date of birth xx/xx/1998 (hereinafter "PAREDES"), for possession with intent to distribute heroin and methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1).

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. I have obtained the facts set forth in this affidavit through my personal participation in the investigation
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described below; from written and oral reports of other law enforcement officers; and, from records, documents and other evidence obtained during this investigation.

4. In June 2023, DEA Salem identified a cellphone used by a suspected drug courier. On June 14, 2023, U.S. Magistrate Judge Jolie A. Russo, District of Oregon, signed a warrant authorizing officers to receive geolocation data for that cellphone, telephone xxx-xxx-5960 (referred to as “Paredes Phone”) used by an unknown male. On June 15, 2023, other officers and I conducted surveillance in conjunction with the geolocation data for Paredes Phone. During the afternoon, officers observed a male depart in a white Nissan Sentra from the parking lot of the Roadway Inn hotel in northeast Salem, Oregon. Officers followed this Altima to a retail area several miles away. Officers later followed this male in the white Nissan Sentra back to the Roadway Inn and later terminated surveillance. I reviewed the geolocation data obtained for Paredes Phone during the surveillance operation. Although the data received was imprecise, this data was consistent with the location and movement of the male in the white Nissan Sentra. As described below, this male who drove the white Nissan Sentra was later identified as PAREDES and is hereinafter referred to as such.

5. Geolocation data showed that Paredes Phone began traveling south from Salem around 2:00 a.m. on June 16, 2023. Data showed that Paredes Phone appeared to travel along I-5 into southern California and stopped in the area of Santa Clarita, California (immediately north of Los Angeles) around 5:49 p.m. The phone remained in this area for approximately 1 ½ to 2 hours and then began traveling northbound. Based on my training and experience, I know that road trips from Oregon to Southern California where the vehicle turns around and heads back north after only a brief stay at a Southern California location is consistent with and indicative of drug trafficking. Geolocation data then showed Paredes Phone continued to travel north. It then

stopped in the area of the Seven Feathers Casino in Canyonville, Oregon near 7:00 a.m. and remained in the area for about five hours.

6. On June 17, 2023, at approximately 9:00 a.m., DEA SA Landis arrived at the casino and located PAREDES in the casino playing a slot machine. Later that morning, DEA SA Otte and SA Thomas arrived and maintained surveillance on PAREDES inside the casino. Officers observed that PAREDES wore a white t-shirt and a blue Kansas City Royals baseball cap that appeared to be identical to the shirt and cap he wore during the surveillance in Salem described above. During the surveillance, PAREDES moved around the non-smoking area of the casino and changes slot machines several times. Shortly before noon, SA Thomas observed PAREDES stand up and walk to different slot machine. SA Thomas then repositioned and was unable to locate PAREDES. The next geolocation data on Paredes Phone was received at 12:12 p.m. and showed that Paredes Phone had departed the area and was a short distance north of the casino.

7. Prior to entering the casino, SA Thomas and SA Landis drove through the casino parking lot and were unable to locate the white Nissan Sentra that PAREDES drove in Salem two days prior. SA Thomas and SA Otte then spoke with security personnel at the casino and were shown video of PAREDES when he arrived at the casino around 7:00 a.m. that morning. The video showed that PAREDES arrived in a small black sedan. This video was not clear enough to observe the license plate or discern the make or model of the vehicle.

8. Officers monitored the geolocation data for Paredes Phone and drove along I-5 northbound looking for PAREDES in a small dark sedan. As officers drove into Eugene on I-5 northbound, TFO Zuniga observed a black Kia Optima occupied by a male driver who fit the appearance of PAREDES. Minutes later, SA Landis drove by the black Kia Optima and

identified the driver as PAREDES. The Kia Optima had no additional occupants. Officers followed PAREDES for approximately 35 miles at which time Salem Det. McDowell activated his emergency lights on his Salem Police Department unmarked patrol vehicle, in the area of milepost 230. PAREDES did not pull over immediately. He rolled down the window of the Kia Optima and used hand gestures to indicate he would pull over. But he did not pull over to the shoulder or take an exit for several miles. Det. McDowell continued to follow the Kia Optima, with his emergency lights activated. At this time, TFO Zuniga's vehicle was in front of PAREDES' Kia Optima and TFO Zuniga attempted to prevent PAREDES from passing. After a time, PAREDES was able to maneuver the Kia Optima through traffic and pass TFO Zuniga's vehicle. As TFO Zuniga and PAREDES's vehicles traveled over a small creek, TFO Zuniga observed PAREDES throw a black bag, roughly the size of a grocery store shopping bag, out the driver's window of the Kia Optima that landed along the shoulder next to the left lane on I-5. Within a minute, TFO McCarley arrived at this area of I-5 and parked on the right shoulder where he maintained surveillance on this black bag. Several minutes later, Benton County Sheriff's Office (BCSO) Deputy Blaser arrived on scene and recovered the black bag from the shoulder of I-5. TFO McCarley noted that there were no other bags in the area that could have been the bag TFO Zuniga observed PAREDES throw out of his vehicle.

9. Approximately ½ mile after PAREDES discarded this bag from the Kia Optima, he exited I-5 at exit 234. PAREDES continued to ignore the emergency lights from Det. McDowell's vehicle and drove away. Det. McDowell chose not to pursue PAREDES for safety reasons. Several minutes later, officers located PAREDES' Kia Optima parked in a residential neighborhood, unoccupied. Officers later searched the Kia and located a Mexican passport issued to PAREDES along with a small quantity of suspected methamphetamine in the front

passenger area. Inside the Kia Optima, officers also found a receipt in PAREDES' name from Seven Feathers Casino, and paperwork indicating the Kia Optima was rented in the name of a woman. Officers searched the area for PAREDES but were unable to locate him. Officers who saw the driver of the Kia Optima later reviewed a booking photograph of PAREDES from a previous arrest and confirmed PAREDES as the driver of the Kia Optima when he threw the black bag out of the window.

10. Inside the black bag recovered by BCSO Blaser from the side of I-5, officers located two packages wrapped in black tape. TFO McCarley and SA Thomas later performed a field test on one of the packages which provided presumptive positive results for the presence of heroin. Combined, the two packages weighed approximately 1,100 grams. I know that this quantity of heroin is for distribution rather than for personal use.

11. Geolocation data received over the next several days showed that Paredes Phone was often in the area of the Roadway Inn, though this data is often imprecise. On the morning of June 20, 2023, SA Otte drove by the Roadway Inn and observed the white Nissan Sentra that was driven by PAREDES on June 15, 2023, parked in the lot.

12. On the morning of June 21, 2023, geolocation data showed that Paredes Phone was at/near the Spirit Mountain Casino in Grand Ronde, Oregon. Officers responded to that location. At approximately 9:00 a.m., PAREDES exited the casino and was taken into custody without incident. As PAREDES walked out of the casino, he was holding Paredes Phone in his hand. PAREDES preferred to speak in Spanish and was read his *Miranda* rights by TFO Zuniga, a native Spanish speaker. During a subsequent interview, PAREDES told TFO Zuniga there was a gun in his Nissan Sentra and granted officers consent to search the vehicle to recover the gun.

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SA Thomas and SA Otte then searched the Nissan Sentra and located a loaded 9mm pistol in the glove box. PAREDES also told TFO Zuniga that he had additional guns in his hotel room.

13. During a search of PAREDES' person pursuant to his arrest, officers located a key for a room at the Roadway Inn. Officers confirmed with Roadway Inn personnel that the key taken from PAREDES was for Room #321. On June 21, 2023, U.S. Magistrate Judge Stacie F. Beckerman, District of Oregon, signed a warrant authorizing officers to search Room #321 at the Roadway Inn hotel. Pursuant to this search, officers located approximately 6 ½ pounds of suspected methamphetamine, 200-300 suspected fentanyl tablets, ½ pound of suspected cocaine, and three firearms. Officers later performed field tests on some of the suspected methamphetamine and cocaine which provided presumptive positive results for the presence of suspected substances.

Conclusion

14. Based on the foregoing, I have probable cause to believe, and I do believe, that PAREDES committed the crime of possession with intent to distribute heroin and methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1). I therefore request that the Court issue a criminal complaint and arrest warrant for PAREDES.

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15. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney Peter Sax. AUSA Sax advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

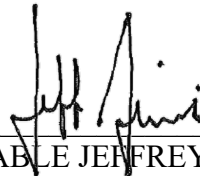
By phone pursuant to Fed R. Crim. P. 4.1

TODD HOAGLAND

Special Agent

Drug Enforcement Administration

Subscribed and sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 8:45 am on June 22, 2023.



HONORABLE JEFFREY ARMISTEAD
UNITED STATES MAGISTRATE JUDGE